

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Interim (not to exceed 30 September 2005) Letter of Instruction (LOI) - Shop Towel Service Contract

1. Reference. Directorate of Environmental Compliance and Management (DECAM) Shop Towel Service Contract
2. Purpose. To provide Units, Directorates and tenant organizations with a clear understanding of the procedures and requirements associated with using this service contract to launder shop towels. This LOI addresses laundering services provided by the contractor and responsibilities that both the DECAM and all organizations on the Installation will incur. Effective immediately disposing of soiled rags into the trash or the use of any other source for these services, or the purchase of other rags or shop towels except as instructed herein will no longer be authorized at Fort Carson.
3. Problem. Colorado Hazardous Waste regulation 6 CCR 1007-3 Subpart 261 states that wastes contaminated with one or more listed hazardous wastes or that exhibit any of the characteristics of ignitability, reactivity, corrosivity or toxicity must be managed as hazardous waste unless specifically exempted from the regulation. Shop towels that are contaminated with listed wastes or exhibit hazardous waste characteristics are considered to be exempt from the provisions of Colorado hazardous waste regulation only if they are picked up, cleaned and delivered back to the customer through a permitted laundering service. The purchase of shop towels or rags from other sources such as WalMart or Envision combined with unauthorized disposal or laundering of these items both on and off the Post is occurring in violation of Colorado hazardous waste regulations. Failure to manage shop towels using a permitted laundry service puts Fort Carson in jeopardy of receiving fines and penalties.
4. Scope. This LOI addresses all units/activities requirement to participate in the program and their responsibilities.
5. Shop Towel Management Process.
 - a. Each unit will be allotted a predetermined quantity of shop towels for use during an average workweek. The unit will designate POCs, one from each maintenance facility, to receive and maintain accountability of its allotment of towels.
 - b. Every Tuesday (from 0800-1100 and 1300-1500) the DECAM Pollution Prevention Facility, Building 3708, will be manned to exchange contaminated towels for clean towels. The unit representative and the DECAM facility worker will jointly inventory the amount of towels turned in and the amount received at the time of the exchange. Due to the number of units/activities that will use this contract it is recommended, where possible, to consolidate collection efforts at the battalion/squadron level.
 - c. On a monthly basis, the contractor will charge the DECAM the negotiated rental rate for each contaminated shop towel and replace it with a new one for reissue. This fee will be broken down to the MSU, Directorate and Tenant organization based on the number of contaminated shop towels they have turned-in and is reimbursable to the DECAM.

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d. Units are to maintain accountability of their shop towels at all times whether they are clean, issued or dirty. An annual loss of greater than 5% will result in the unit being in noncompliance with local environmental regulations. The contractor will replace legitimately worn towels at no charge. The cost to replace lost or missing towels will be the responsibility of the unit at the negotiated replacement cost under the shop towel service contract. The responsible unit will pay for this cost via timely funds transfer to the DECAM.

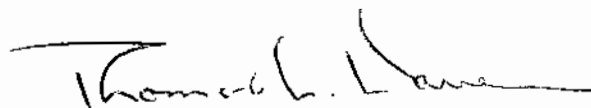
e. Units that are deploying may purchase additional shop towels on a one-time, one-issue basis at the negotiated contract purchase rate to take with them on their deployment. Units must submit in writing, to the DECAM their requirement with applicable fund site at least 10 working days in advance of their desired pickup date. For deployments exceeding 3 weeks in duration, quarterly inventory adjustments may be required.

f. Units must store used shop towels at their motor pools in compliance with Post Fire Regulation 420-5 Para 19(b)4 which states that materials of this nature must be stored in an approved container. An approved container is a metal container with a self closing lid.

g. The shop towels are rented from the contractor, therefore upon termination of this contract all towels will be returned to the contractor.

h. The DECAM will manage the delivery, pick up and laundering services provided by this contract. Mr. Ed Tebo, the Prevention Branch Chief will be the COR and can be reached at 524-3534. Mr. Scott Clark, Pollution Prevention Program Coordinator, will be the operational POC for any questions and can be reached at 526-1739.

6. Effective Date. The effective date of this LOI is 9 May 2005. This LOI expires on 30 September 2005.



THOMAS L. WARREN
Director, Environmental
Compliance and Management

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